

REMARKS

Claims 1-13 are in the application. Each of the claims stands rejected under 35 U.S.C. 103(a) as being unpatentable over Reynolds (U.S. Patent 3,590,960) in view of Linker et al (U.S. Patent 4,575,003). The Examiner states that Linker '003 teaches everything in Applicants' Claims 1, 10 and 12, with the exception of a heat transfer system between the vehicle braking system and the windshield washer fluid system, or between a vehicle braking system and an engine coolant system. The Examiner continues with the argument that Reynolds '960 teaches "a heat exchanger 18 for extracting heat generated by vehicle braking system into a radiator coolant." The Examiner concludes his argument with the assertion that it would have been obvious to either insert a heat exchange device 10 or 46 of Linker '003 into the radiator hose line of Reynolds '960, or alternatively, to add a brake cooling system of Reynolds '960 into the Linker '003 engine cooling system so that heat generated by a braking system could be used to heat the windshield fluid. Applicants respectfully traverse this rejection and request that Claims 1-13 be reconsidered in view of these remarks and passed to issue over the Examiner's rejection.

Applicants respectfully submit that neither Linker '003, nor Reynolds '960, whether taken singly or in combination with each other, either teach or suggest Applicants' claimed invention. The fact of the matter is that the Linker '003 and Reynolds '960 references cannot be combined; this is abundantly clear from column 1 of Reynolds '960 at lines 41-45 wherein it is stated "[I]t is another advantage of this system that the vehicle brakes actually add to the cooling effect of the vehicle engine cooling system. Tests in hot weather and at sustained high speeds have indicated that as much as 10 per cent higher air-to-boil temperature was obtained due to the cooling effect of the brakes." In effect, Reynolds uses his system as an additional source of engine cooling.

One skilled in the art reading Reynolds '960, which is described as adding to engine cooling, would not be led to use brakes as a source for heat for a windshield washer system as taught by Linker. Rather, Applicants respectfully submit that the proffered combination of Reynolds '960 and Linker '003 amounts to hindsight reconstruction of

Applicants' invention. As a result, each of Claims 1-13 should be passed to issue over the Examiner's rejection. Such action is earnestly solicited.

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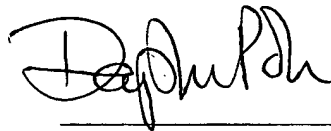
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CERTIFICATE OF MAILING

I hereby certify that the enclosed Amendment is being deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to Mail Stop Fee Amendment, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this 23 day of October 2003.



Daphne Poh